

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
CENTRAL VALLEY REGION**

In the Matter of:

ORDER R5-2020-0503

**CITY OF PORTOLA
WASTEWATER TREATMENT PLANT
PLUMAS COUNTY**

**SETTLEMENT AGREEMENT AND
STIPULATION FOR ENTRY OF
ADMINISTRATIVE CIVIL LIABILITY
ORDER**

I. Introduction

1. This Settlement Agreement and Stipulation for Entry of Administrative Civil Liability Order (Stipulated Order or Order) is entered into by and between the Assistant Executive Officer of the California Regional Water Quality Control Board, Central Valley Region (Central Valley Water Board or Water Board), on behalf of the Central Valley Water Board Prosecution Team (Prosecution Team), and the City of Portola (City or Discharger)(collectively known as the Parties) and is presented to the Central Valley Water Board, or its delegee, for adoption as an order by settlement, pursuant to California Water Code section 13323 and Government Code section 11415.60.

II. Recitals

2. The Discharger owns and operates the Portola Wastewater Treatment Plant (Facility), which provides sewerage service to the Discharger in Plumas County. Treated domestic wastewater is discharged to the Middle Fork of the Feather River, a water of the United States.
3. On 8 October 2009, the Central Valley Water Board adopted WDRs Order R5-2009-0093 (NPDES No. CA0077844) to regulate the Facility, effective 8 October 2009, which contained new requirements and rescinded WDRs Order R5-2003-0110, except for enforcement purposes.
4. On 7 December 2018, the Central Valley Water Board adopted WDRs Order R5-2018-0088, effective 1 February 2019, which contained new requirements and rescinded WDRs Order R5-2009-0093, except for enforcement purposes.
5. On 8 November 2018, Central Valley Water Board staff issued the Discharger a Notice of Violation (NOV) for effluent limitation violations of WDRs Order R5-2009-0093 that occurred between 20 March 2018 and 3 April 2018. Subsequent

conversations between both parties resulted in the Discharger requesting that the mandatory minimum penalties (MMPs) resulting from the violations be applied toward a compliance project to offset the MMPs, as allowed by Water Code section 13385(k).

6. On 20 August 2019, Central Valley Water Board staff issued the Discharger a Notice of Violation (NOV) for effluent limitation violations of WDRs Order R5-2018-0088 that occurred between 19 February 2019 and 30 April 2019. Subsequent conversations between both parties resulted in the Discharger requesting that the MMPs resulting from the violations be applied toward a compliance project to offset the MMPs, as allowed by Water Code section 13385(k).
7. WDRs Order R5-2009-0093 section IV.A.1 includes, in part, the following effluent limitations:

Table 1. Effluent Limitations

Parameter	Units	Average Monthly	Average Weekly	Maximum Daily
Total Suspended Solids	mg/L	30	45	90

- c. Acute Whole Effluent Toxicity. Survival of aquatic organisms in 96-hour bioassays of undiluted waste shall be no less than:
 - i. 70%, minimum for any one bioassay
 - e. Total Coliform Organisms. Effluent total coliform organisms shall not exceed:
 - i. 23 most probable number (MPN) per 100 mL, as a 7-day median; and
 - ii. 240 MPN/100 mL, more than once in any 30-day period.
8. WDRs Order R5-2018-0088 section IV.A.1 includes, in part, the following effluent limitations:

- c. Percent Removal. The average monthly percent removal of 5-day biochemical oxygen demand (BOD5) and total suspended solids (TSS) shall not be less than 65 percent.
 - e. Total Coliform Organisms. Effluent total coliform organisms shall not exceed the following with compliance measured at Monitoring Location EFF-001 as described in the MRP:
 - i. 23 most probable number (MPN) per 100 mL, as a 7-day median; and
 - ii. 240 MPN/100 mL, more than once in any 30-day period.
9. Water Code section 13385, subdivisions (h) and (i) require assessment of mandatory penalties and state, in part, the following:

Water Code section 13385, subdivision (h)(1) states:

Notwithstanding any other provision of this division, and except as provided in subdivisions (j), (k), and (l), a mandatory minimum penalty of three thousand dollars (\$3,000) shall be assessed for each serious violation

Water Code section 13385, subdivision (h)(2) states:

For the purposes of this section, a “serious violation” means any waste discharge that violates the effluent limitations contained in the applicable waste discharge requirements for a Group II pollutant, as specified in Appendix A to Section 123.45 of Title 40 of the Code of Federal Regulations, by 20 percent or more or for a Group I pollutant, as specified in Appendix A to Section 123.45 of Title 40 of the Code of Federal Regulations, by 40 percent or more.

Water Code section 13385, subdivision (i)(1) states, in part:

Notwithstanding any other provision of this division, and except as provided in subdivisions (j), (k), and (l), a mandatory minimum penalty of three thousand dollars (\$3,000) shall be assessed for each violation whenever the person does any of the following four or more times in any period of six consecutive months, except that the requirement to assess

the mandatory minimum penalty shall not be applicable to the first three violations:

- A) Violates a waste discharge requirement effluent limitation.
- B) Fails to file a report pursuant to Section 13260.
- C) Files an incomplete report pursuant to Section 13260.
- D) Violates a toxicity effluent limitation contained in the applicable waste discharge requirements where the waste discharge requirements do not contain pollutant-specific effluent limitations for toxic pollutants

10. According to the Discharger's self-monitoring reports, the Discharger committed nine (9) non-serious violations of the above effluent limitations contained in WDRs Orders R5-2009-0093 and R5-2018-0088. Three (3) of these non-serious violations are subject to mandatory penalties under CWC Water Code section 133385 subdivision (i)(1) because these violations were preceded by three or more similar violations within a 180-day period. The mandatory minimum penalty for these non-serious violations is **nine thousand dollars (\$9,000)**.

11. The total amount of the mandatory minimum penalties assessed for the alleged effluent violations is **nine thousand dollars (\$9,000)**. As stated herein, a detailed list of the alleged effluent violations is included in the Record of Violations (Attachment A), which is incorporated herein.

12. Water Code section 13385 (k) states:

(1) In lieu of assessing all or a portion of the mandatory minimum penalties pursuant to subdivisions (h) and (i) against a publicly owned treatment works serving a small community, the state board or the regional board may elect to require the publicly owned treatment works to spend an equivalent amount towards the completion of a compliance project proposed by the publicly owned treatment works, if the state board or the regional board finds all of the following:

- (A) The compliance project is designed to correct the violations within five years.

(B) The compliance project is in accordance with the enforcement policy of the state board, excluding any provision in the policy that is inconsistent with this section.

(C) The publicly owned treatment works has prepared a financing plan to complete the compliance project.

(2) For the purposes of this subdivision, “a publicly owned treatment works serving a small community” means a publicly owned treatment works serving a population of 10,000 persons or fewer or a rural county, with a financial hardship as determined by the state board after considering such factors as median income of the residents, rate of unemployment, or low population density in the service area of the publicly owned treatment works.

13. Under the State Water Resources Control Board’s Water Quality Enforcement Policy (Enforcement Policy), a publicly owned treatment works (POTW) serving a small community is a POTW serving a community that has a financial hardship and has a population of 10,000 or fewer people or lies completely within one or more rural counties.

14. Under the Enforcement Policy, “financial hardship” means that the community served by the POTW meets one of the following criteria:

A) Median household income for the community is less than 80 percent of the California median household income.

B) The community has an unemployment rate of 10 percent or greater, or

C) Twenty percent of the population is below the poverty level.

15. The Central Valley Water Board finds the Discharger is eligible for a Compliance Project because the Facility is a POTW serving a small community with a financial hardship. The Discharger serves a population of 2,104 with a median household income (MHI) of \$28,150, which is less than 80% of the statewide MHI, according to the 2013-2017 American Community Survey 5-Year Estimates.

16. On 18 September 2019, the Discharger submitted a Compliance Project proposal to reduce the inflow and infiltration to the sewer system by injecting foam and

epoxy into cracks and leaking manholes throughout the City of Portola. The Compliance Project will be completed during wet weather when inflow and infiltration are visible at the manholes. Additional information and requirements regarding the Compliance Project are contained in Attachment B of this Order, hereby incorporated by reference.

17. The Parties have engaged in confidential settlement negotiations and agree to settle the matter without administrative or civil litigation by presenting this Stipulated Order to the Central Valley Water Board, or its delegee, for adoption as an order by settlement, pursuant to Water Code section 13323 and Government Code section 11415.60. To resolve the violations by consent and without further administrative proceedings, the Parties have agreed to the imposition of administrative civil liability (ACL) in the amount of **nine thousand dollars (\$9,000)** in MMPs against the Discharger.

18. The Central Valley Water Board Prosecution Team believes that the resolution of the alleged violations is fair and reasonable and fulfills its enforcement objectives, that no further action is warranted concerning the violations alleged herein, and that this Stipulated Order is in the best interest of the public.

III. Stipulations

The Parties stipulate to the following:

19. **Jurisdiction:** The Parties agree that the Central Valley Water Board has subject matter jurisdiction over the matters alleged in this action and personal jurisdiction of the Parties to this Stipulation.

20. **Administrative Civil Liability:**

A) The Discharger hereby agrees to the imposition of an ACL in the amount of **nine thousand dollars (\$9,000)** to the Central Valley Water Board to resolve the violations alleged in Attachment A to this Order. That ACL will be spent in accordance with the Compliance Project described in Attachment B.

B) The entire **nine thousand dollar (\$9,000)** penalty will be suspended pending completion of the Compliance Project described in Attachment B. In accordance with Water Code section 13385(k), the ACL of **\$9,000** shall

be permanently suspended when the Compliance Project is completed to the satisfaction of the Central Valley Water Board by the completion date specified in the attached Compliance Project proposal.

21. **Compliance Project:** The Discharger understands that the completed Compliance Project is a material condition of this settlement of liability between the Discharger and the Central Valley Water Board Prosecution Team. The proposed project qualifies as a Compliance Project within the meaning of Water Code section 13385 (k) because it is an upgrade or repair to existing facilities being undertaken to reduce the volume of influent caused by inflow and infiltration in the sewer collection system. Since the Facility is operated by gravity only, a reduction in influent flow will result in longer chlorine contact time and more effective reduction of total coliform organisms in the effluent. Less inflow and infiltration will also reduce the influent waste stream dilution, thereby resulting in better biological treatment that improves BOD and TSS effluent concentrations and removal efficiency. In addition, less influent flow will ultimately reduce the amount of effluent discharged to the Middle Fork of the Feather River.
22. **Compliance Project Inspection:** The Discharger shall permit inspection of the Compliance Project by Central Valley Water Board staff during normal business hours, at any location where the Compliance Project is being implemented, as well as review of any documents associated with implementation of the Compliance Project, at any time without notice.
23. **Compliance Project Budget:** The amount that the Discharger will expend on the Compliance Project is in excess of the MMP that the Water Board is required to assess under Water Code sections 13385(h) for the violations listed in Attachment A of this Order. The Discharger has prepared a financing plan to complete the project.
24. **Compliance Project Schedule:** The Compliance Project is designed to correct the violations within five years because the it will be completed no later than one year from the date on which this Stipulated Order is adopted.
25. **Third Party Financial Audit of Compliance Project:** At the written request of the Central Valley Water Board, the Discharger, at its sole cost, shall submit a report prepared by an independent third party(ies) acceptable to the Central Valley Water Board providing such party's(ies's) professional opinion that the

Discharger has expended money in the amounts claimed by the Discharger. The written request shall specify the reasons why the audit is being requested. The audit report shall be provided to the Central Valley Water Board within six (6) months of notice from the Central Valley Water Board to the Discharger of the need for an independent third-party audit. The audit need not address any costs incurred by the Central Valley Water Board for oversight.

26. Compliance with Applicable Laws and Regulatory Changes: The Discharger understands that payment of an ACL in accordance with the terms of this Stipulated Order and/or compliance with the terms of this Stipulated Order is not a substitute for compliance with applicable laws, and that additional violations of the type alleged may subject it to further enforcement, including additional ACLs. Nothing in this Stipulated Order shall excuse the Discharger from meeting any more stringent requirements which may be imposed hereafter by changes in applicable and legally binding legislation or regulations.

27. Failure to Complete Compliance Project: If the Compliance Project is not completed to the satisfaction of the Water Board by the completion date, the suspended ACL of **\$9,000** will be due and immediately payable to the State Water Pollution Cleanup and Abatement Account (CAA).

28. Party Contacts for Communications Related to Stipulated Order:

FOR THE CENTRAL VALLEY WATER BOARD:

Mike Nilsen, Water Resource Control Engineer
NPDES Unit
364 Knollcrest Drive, Suite 205
Redding, CA 96002
(530) 224-4853
Michael.Nilsen@waterboards.ca.gov

FOR THE DISCHARGER:

Todd Roberts, Public Works Director
City of Portola
P.O. Box 1225
Portola, CA 96122

(530) 832-4216
t.roberts@ci.portola.ca.us

29. **Attorney's Fees and Costs:** Except as otherwise provided herein, each Party shall bear all attorneys' fees and costs arising from the Party's own counsel in connection with the matters set forth herein.
30. **Public Notice:** The Discharger understands that this Stipulated Order will be noticed for a 30-day public review and comment period prior to consideration by the Central Valley Water Board, or its delegee. If significant new information is received that reasonably affects the propriety of presenting this Stipulated Order to the Central Valley Water Board, or its delegee, for adoption, the Assistant Executive Officer may unilaterally declare this Stipulated Order void and decide not to present it to the Central Valley Water Board, or its delegee. The Discharger agrees that it may not rescind or otherwise withdraw its approval of this proposed Stipulated Order.
31. **Procedure:** The Parties agree that the procedure that has been adopted for the approval of the settlement by the Parties and review by the public, as reflected in this Order, will be adequate. In the event procedural objections are raised prior to this Stipulated Order becoming effective, the Parties agree to meet and confer concerning any such objections and may agree to revise or adjust the procedure as necessary or advisable under the circumstances.
32. **No Waiver of Right to Enforce:** The failure of the Prosecution Team or Central Valley Water Board to enforce any provision of this Stipulated Order shall in no way be deemed a waiver of such provision, or in any way affect the validity of this Stipulated Order. The failure of the Prosecution Team or Central Valley Water Board to enforce any such provision shall not preclude it from later enforcing the same or any other provision of this Stipulated Order. No oral advice, guidance, suggestions, or comments by employees or officials of any Party regarding matters covered under this Stipulated Order shall be construed to relieve any Party regarding matters covered in this Stipulated Order. The Central Valley Water Board reserves all rights to take additional enforcement actions, including without limitation, the issuance of ACL complaints or orders for violations other than those addressed by this Order.
33. **Effect of Stipulated Order:** Except as expressly provided in this Stipulated Order, nothing in this Stipulated Order is intended nor shall it be construed to

preclude the Central Valley Water Board or any state agency, department, board or entity or any local agency from exercising its authority under any law, statute, or regulation.

34. **Interpretation:** This Stipulated Order shall not be construed against the party preparing it but shall be construed as if the Parties jointly prepared it and any uncertainty and ambiguity shall not be interpreted against any one party.
35. **Modification:** This Stipulated Order shall not be modified by any of the Parties by oral representation whether made before or after the execution of this Order. All modifications must be made in writing and approved by the Central Valley Water Board or its delegee.
36. **Integration:** This Stipulated Order constitutes the entire agreement between the Parties and may not be amended or supplemented except as provided for in this Stipulated Order.
37. **If Order Does Not Take Effect:** In the event that this Stipulated Order does not take effect because it is not approved by the Central Valley Water Board, or its delegee, or is vacated in whole or in part by the State Water Board or a court, the Parties acknowledge that the Prosecution Team may proceed to a contested evidentiary hearing before the Central Valley Water Board to determine whether to assess an ACL for the underlying alleged violations, or may continue to pursue settlement. The Parties agree that all oral and written statements and agreements made during the course of settlement discussions will not be admissible as evidence in any subsequent administrative or judicial proceeding or hearing and will be fully protected by California Evidence Code sections 1152 and 1154; California Government Code section 11415.60; Rule 408, Federal Rules of Evidence; and any other applicable privilege under federal and/or state law. The Parties also agree to waive any and all objections related to their efforts to settle this matter, including, but not limited to:
- A) Objections related to prejudice or bias of any of the Central Valley Water Board members or their advisors and any other objections to the extent that they are premised in whole or in part on the fact that the Central Valley Water Board members or their advisors were exposed to some of the material facts and the Parties settlement positions, and therefore may have formed impressions or conclusions, prior to conducting any contested evidentiary hearing in this matter; or

B) Laches or delay or other equitable defenses based on the time period that the Order or decision by settlement may be subject to administrative or judicial review.

38. **Waiver of Hearing:** The Discharger has been informed of the rights provided by Water Code section 13323, subdivision (b), and hereby waives its right to a hearing before the Central Valley Water Board.

39. **Waiver of Right to Petition:** The Discharger hereby waives the right to petition the Central Valley Water Board's adoption of the Stipulated Order as written for review by the State Water Resources Control Board, and further waives the right, if any, to appeal the same to a California Superior Court and/or any California appellate level court.

40. **Covenant Not to Sue:** Upon the effective date of this Stipulated Order, the Discharger shall and does release, discharge, and covenant not to sue or pursue any civil or administrative claims against any State Agency or the State of California, its officers, agents, directors, employees, attorneys, representatives, for any and all claims or cause of action, which arise out of or are related to this action.

41. **Water Boards Not Liable:** Neither the Central Valley Water Board members, nor the Central Valley Water Board staff, attorneys, or representatives shall be liable for any injury or damage to persons or property resulting from the negligent or intentional acts or omissions by the Discharger or its respective directors, officers, employees, agents, representatives, or contractors in carrying out activities pursuant to this Order, nor shall the Central Valley Water Board, its members, staff, attorneys, or representatives be held as parties to or guarantors of any contract entered into by the Discharger, or its directors, officers, employees, agents, representatives, or contractors in carrying out activities pursuant to this Order.

42. **Authority to Bind:** Each person executing this Stipulated Order in a representative capacity represents and warrants that he or she is authorized to execute this Order on behalf of and to bind the entity on whose behalf he or she executes the Order.

43. **Necessity for Written Approvals:** All approvals and decisions of the Central Valley Water Board under the terms of this Stipulated Order shall be

communicated to the Discharger in writing. No oral advice, guidance, suggestions, or comments by employees or officials of the Central Valley Water Board regarding submissions or notices shall be construed to relieve the Discharger of its obligation to obtain any final written approval required by this Stipulated Order.

44. **No Third Party Beneficiaries:** This Stipulated Order is not intended to confer any rights or obligation on any third party or parties, and no third party or parties shall have any right of action under this Stipulated Order for any cause whatsoever.
45. **Severability:** This Stipulated Order is severable; should any provision be found invalid the remainder shall remain in full force and effect.
46. **Effective Date:** This Stipulated Order shall be effective and binding on the Parties upon the date the Central Valley Water Board, or its delegee, enters the Order.
47. **Counterpart Signatures:** This Order may be executed and delivered in any number of counterparts, each of which when executed and delivered shall be deemed to be an original, but such counterparts shall together constitute one document.

IT IS SO STIPULATED.

California Regional Water Quality Control Board Prosecution Team
Central Valley Region

By: Original signed by
Clint E. Snyder, P.G.
Assistant Executive Officer

12/17/19
Date

City of Portola

By: Original signed by
Todd Roberts
Public Works Director

12/17/19
Date

HAVING CONSIDERED THE PARTIES STIPULATIONS, THE CENTRAL VALLEY REGIONAL WATER QUALITY CONTROL BOARD, BY AND THROUGH ITS EXECUTIVE OFFICER, FINDS THAT:

1. The foregoing Stipulation is fully incorporated herein and made part of this Order.
2. This is an action to enforce the laws and regulations administered by the Central Valley Water Board. The Central Valley Water Board finds that issuance of this Order is exempt from the provisions of the California Environmental Quality Act (Public Resources Code, sections 21000 et seq.), in accordance with section 15321, subdivision (a)(2), Title 14, of the California Code of Regulations.
3. The Executive Officer of the Central Valley Water Board is authorized to refer this matter directly to the Attorney General for enforcement if the Discharger fails to perform any of its obligations under this Order.

Pursuant to Water Code section 13323 and Government Code section 11415.60, **IT IS HEREBY ORDERED** on behalf of the California Regional Water Quality Control Board, Central Valley Region.



Patrick Pulupa, Executive Officer

February 5, 2020

Enclosures (2):
Attachment A: Record of Violations
Attachment B: Compliance Project Description

**R5-2020-0503 - ATTACHMENT A
RECORD OF VIOLATIONS FOR ASSESSING MANDATORY MINIMUM PENALTIES**

**City of Portola
Portola Wastewater Treatment Plant**

RECORD OF VIOLATIONS (20 March 2018 – 30 April 2019) MANDATORY MINIMUM PENALTIES
(Data reported under Monitoring and Reporting Programs R5-2009-0093 and R5-2018-0088)

The following table lists the alleged violations, including those subject to mandatory minimum penalties (MMPs), pursuant to Water Code section 13385(h) and (i).

Table A - Violations subject to Mandatory Minimum Penalties

Item	Date	Parameter	Units	Limit	Measured	Period	Violation Type	MMP Type	MMP Amount	CIWQS
1	20-Mar-18	Total Coliform	MPN/100 mL	23	350	7-Day Median	OEV	NCHRON	\$0	1043440
2	27-Mar-18	Total Coliform	MPN/100 mL	23	1600	7-Day Median	OEV	NCHRON	\$0	1043438
3	27-Mar-18	Total Coliform	MPN/100 mL	240	1600	30-Day Period	OEV	NCHRON	\$0	1049966
4	31-Mar-18	Total Suspended Solids	mg/L	30	35	Average Monthly	CAT 1	CHRON	\$3,000	1049585
5	3-Apr-18	Acute Whole Effluent Toxicity	% Survival	70	55	One Bioassay	ATOX	CHRON	\$3,000	1049586
6	19-Feb-19	Total Coliform	MPN/100 mL	23	>1600	7-Day Median	OEV	NCHRON	\$0	1058006
7	28-Feb-19	Total Coliform	MPN/100 mL	23	240	7-Day Median	OEV	NCHRON	\$0	1058007
8	23-Apr-19	Total Coliform	MPN/100 mL	23	>1600	7-Day Median	OEV	NCHRON	\$0	1059789

**R5-2020-0503 - ATTACHMENT A
RECORD OF VIOLATIONS FOR ASSESSING MANDATORY MINIMUM PENALTIES**

Item	Date	Parameter	Units	Limit	Measured	Period	Violation Type	MMP Type	MMP Amount	CIWQS
9	30-Apr-19	Total Suspended Solids	% Removal	65	57.6	Average Monthly	CAT 1	CHRON	\$3,000	1061914

PAYMENT AMOUNT VIOLATIONS SUMMARY:

VIOLATIONS AS OF: 10/1/2019

Group I Serious Violations:	0
Group II Serious Violations:	0
Non-Serious Violations Not Subject to MMPs:	6
<u>Non-serious Violations Subject to MMPs:</u>	<u>3</u>
Total Violations Subject to MMPs:	3

Mandatory Minimum Penalty Amount for Effluent Limit Violation(s)

3 Non-Serious Violations subject to MMPs x \$3,000 per Violation = \$9,000

Total Mandatory Minimum Penalty = \$9,000

R5-2020-0503 - ATTACHMENT A
RECORD OF VIOLATIONS FOR ASSESSING MANDATORY MINIMUM PENALTIES

Table A - Definitions

Abbreviation	Description
ATOX	Violations of acute whole effluent toxicity limitation.
CAT 1	Violation of effluent limitation for Group I pollutant.
CHRON	Chronic violation as defined by Water Code section 13385 (i). Any non-serious violation that falls within a 180-day period with three preceding violations. Thus, the fourth non-serious violation that occurs within a 180-day period is subject to MMPs.
CIWQS	California Integrated Water Quality System (https://www.waterboards.ca.gov/water_issues/programs/ciwqs/)
Measured	Reported value for the monitoring period by the Discharger.
MMP Type	Classification of the type of MMP violation.
Occurrence Date	Date that a violation occurred. For averaging period limitation violations, such as weekly and monthly averages, the last day of the reporting period is used such as last day of the week (Saturday) and last day of the month, respectively.
OEV	Violation of any constituent-specific effluent limitation not included in Group I or Group II.
NCHRON	Non-serious violation falls within the first three violations in a 180-day period, thus, not subject to MMP.

**R5-2020-0503 - ATTACHMENT B
COMPLIANCE PROJECT DESCRIPTION**

Compliance Project Description

Compliance Project Title: City of Portola Wastewater Treatment Plant (WWTP) Compliance Project

Geographic Area of Interest: City of Portola WWTP, Plumas County

Name of Responsible Entity: City of Portola

Contact Information:

Todd Roberts, Public Works Director
City of Portola WWTP
P.O. Box 1225
Portola, CA 96122
(530) 832-4216
t.roberts@ci.portola.ca.us

Compliance Project Description:

Injecting foam and epoxy into leading manholes throughout the sanitary sewer collection system.

Compliance Project Goals:

Reduce inflow and infiltration (I&I) into sanitary sewer collection system through leaks in existing manholes. By reducing I&I, influent volume to the WWTP will be reduced, resulting in longer chlorine contact time for disinfection to meet total coliform effluent limits. In addition, the reduced influent volume will result in better biological treatment to improve BOD and TSS concentrations to meet concentration-based and percent removal effluent limits.

Estimated Cost of Compliance Project Completion:

The estimated project cost is over \$9,000. The cost of labor and material is approximately \$1,500 at each manhole and the work is expected to be completed on at least 6 manholes during the wet weather within the next year.

Compliance Project Milestones and Completion Dates:

The project will be completed no later than one year from the adoption date of the Stipulated Order. Since work can only be completed during wet weather, there is no specified date to begin the Compliance Project.

Final Report:

No later than one year of from the adoption date of the Stipulated Order, the Discharger

**R5-2020-0503 - ATTACHMENT B
COMPLIANCE PROJECT DESCRIPTION**

will submit a report declaring the completion of the Compliance Project and detailing fund expenditures and goals achieved.